



**Headquarters**

120 South Riverside Plaza, Suite 2000  
Chicago, Illinois 60606-6995  
312/899-0040 800/877-1600

**Washington, D.C. Office**

1120 Connecticut Avenue N.W., Suite 480  
Washington, DC 20036-3989  
202/775-8277 800/877-0877

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Docket Clerk

Fruit and Vegetable Programs, AMS, USDA  
1400 Independence Avenue, NW, Stop 0243  
Washington, DC 20250-0245

RE: Docket No. FV06-1290-1 PR; Specialty Crop Block Grant Program; Notice of Request for Approval of a New Information Collection

The American Dietetic Association (ADA) is a 90-year old organization that represents 65,000 registered dietitians (RDs). ADA has a long history of involvement in food, food assistance, food safety and nutrition programs. Members of ADA are sought-out participants in domestic and international discussions on nearly every aspect of food, nutrition and health. As such, we understand well the importance of agriculture on the food and nutrient intake of Americans.

We applaud the efforts of both Congress and the USDA to provide resources to programs that promote healthful diets in addition to agricultural competitiveness. One of the proposed Specialty Crop Block Grant (SCBG) Program goals of increasing fruit, vegetable, and nut consumption is consistent with U.S. government health recommendations. The 2005 *Dietary Guidelines for Americans* emphasize the important role fruits and vegetables play in maintaining a healthful and balanced diet, and they recommend consuming a variety of foods within those two categories. Well-known studies, such as Dietary Approaches to Stop Hypertension (DASH), have established a beneficial link between increased consumption of fruits and vegetables and a reduced risk of chronic disease. The Healthy People 2010 Health Objectives for the Nation include specific objectives for increasing fruit and vegetable consumption in the U.S. population. These government recommendations do not differentiate between fresh, frozen, canned or dried fruits and vegetables, and all of these forms contribute key nutrients to the diet. As such, the SCBG program should include frozen, canned and dried fruits and vegetables in addition to fresh fruit and vegetables.

ADA is particularly interested in USDA making the top priority the integration of the dual goals of the SCBG program – increasing fruit, vegetable, and nut consumption and improving the competitiveness of United States specialty crop producers – as part of the program outcome measures. Evaluation measures that bring together the agriculture and food components of these initiatives would measure not only the impact on the competitiveness of U.S. specialty crop producers, but also the impact on food and nutrient intake of Americans. We encourage partnerships between State Departments of Agriculture and current food and nutrition programs as a key criterion for program

participation. Alternatively, at least that one of the outcome measures could include affiliation with existing food assistance or nutrition programs. Possible programs for partnership could include but should not be limited to:

- Department of Defense Fresh Fruit and Vegetable Program - Utilizes the Defense Supply Center Philadelphia (DSCP) to supply fresh fruit and vegetables directly to schools along with their deliveries to military installations or other sites in the United States.
- Senior Farmers' Market Nutrition Program (SFMNP) - Awards grants to States, United States Territories, and federally-recognized Indian tribal governments to provide low-income seniors with coupons that can be exchanged for eligible foods at farmers' markets, roadside stands, and community supported agriculture programs.
- WIC Farmers' Market Nutrition Program (FMNP) - Provides fresh, unprepared, locally grown fruits and vegetables to WIC participants.
- Schools/Child Nutrition (CN) Commodity Programs - Provide USDA-purchased food for the National School Lunch Program, Child and Adult Care Food Program, and the Summer Food Service Program.
- The Emergency Food Assistance Program (TEFAP) – States provide food made available by USDA to local agencies, usually food banks, which in turn, distribute the food to soup kitchens and food pantries that directly serve the public.
- Free Fruit and Vegetable Program - Provides fresh and dried fruits and fresh vegetables free to children in elementary and secondary schools.

As these food and nutrition programs all have a state component, a requirement of coordination between the State Departments of Agriculture and the responsible State Agency for food assistance and nutrition programs to receive a Specialty Crop Block Grant would not only provide a benefit to both specialty crop producers and the food programs, but possibly lay the groundwork for future collaborations between growers and food assistance program managers.

Outcome measures could focus on the collaboration components of the program, as well as incorporate measures often collected in food assistance programs, such as impact on food intake. Examples of outcomes measures include impact on fruit and vegetable offerings in the food and nutrition program, cost implications for growers and the food program, and program participants' perceptions of fruits and vegetables. More advanced outcomes measures could include actual impact of the collaboration on intake, such as impact on food choices by program participants and impact on overall dietary intake of program participants. Measurement of both pre- and post-collaborative efforts should be conducted.

Clearly, there is significant potential benefit in addressing food, nutrition and health issues as part of the agricultural system. ADA believes that the USDA can utilize the intent of the Special Crop Competitiveness Act of 2004 to promote increased consumption of specialty crops and increase the competitiveness of specialty crop producers to develop a program that directly links agriculture to food intake. Numerous food assistance programs are available to partner with specialty crop producers to bring fruits, vegetables, and nuts to their participants. We also encourage USDA to consider future SCBG collaboration opportunities to address the inclusion of fruits and vegetables in the growing market of away-from-home foods.

Thank you for taking our comments into consideration. If you wish further information, please contact Jennifer Weber, Manager of National Nutrition Policy, at 202-775-8277, extension 6012 or [jweber@eatright.org](mailto:jweber@eatright.org).

Sincerely,

/s/

Mary H. Hager, PhD, RD  
Senior Manager, Regulatory Affairs

/s/

Jennifer A. Weber, MPH, RD  
Manager, National Nutrition Policy